

**REMARKS**

This is a full and timely response to the outstanding non-final Office Action mailed November 5, 2003. Upon entry of the amendments in this response, claims 1 – 5, 9, 10 and 13 – 18 are pending. Applicants canceled claims 6 – 8 and 11 – 12 without prejudice, waiver, or disclaimer and merely to reduce the number of disputed issues. Applicants amended claims 1, 5, 10, and 15 as indicated above. Reconsideration and allowance of the application and pending claims 1 – 5, 9, 10 and 13 – 18 are respectfully requested.

I. Claims 1 – 5, 9, 10 and 13 – 18 are Patentable Over Art of Record

The Office Action rejects claims 1 – 5, 7, 9, 10, 12, 13, 15, 16 and 18 under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,473,072 to Comiskey et al. (“the ‘072 patent”). The Office Action rejects claims 6, 8, 11 and 14 under 35 U.S.C. §103(a) as allegedly being unpatentable over the ‘072 patent in view of U.S. Patent No. 6,177,927 to Chery et al. (“the ‘927 patent”). The Office Action rejects claim 17 under 35 U.S.C. 103(a) as allegedly being unpatentable over the ‘072 patent in view of “applicants’ admitted prior art.”

The rejection of claims 6 – 8, 11, and 12 is rendered moot in light of the cancellation of these claims.

With regard to claims 1 – 5, 9, 10 and 13 – 18, Applicants respectfully submit that all rejections should be withdrawn for at least the reason that the cited art fails to disclose, teach, or suggest all of the features/limitations/elements in the claims. Amended independent claims 1 and 10 recite: “enabling a user to select one of a plurality of reference images to be displayed on the electronic paper display device, the reference images comprising a predefined image which is used to assist the user in drawing a related image over the

reference image without having to first draw the reference image.” Applicants respectfully submit that this feature/limitation/element is not disclosed, taught, or suggested by either the ‘072 patent or the ‘927 patent.

The Office Action suggests that the ‘072 patent teaches that the display device is configured to display a reference image over which a user may write on the writing surface. The Office Action argues that any image over which the user may write constitutes a reference image. Applicants respectfully submit that the ‘072 patent does not disclose, teach, or suggest the feature/limitation/element of “the reference images comprising a predefined image which is used to assist the user in drawing a related image over the reference image without having to first draw the reference image.” The so-called reference images disclosed in the ‘072 patent merely refer to an image being displayed on the electronic paper display device during a conventional electronic whiteboard session. For example, conventional electronic whiteboards are typically connected to a personal computer. In this manner, the images being displayed on the display device are merely replications of the computer screen of the personal computer.

The ‘927 patent also fails to disclose, teach, or suggest the feature/limitation/element of “enabling a user to select one of a plurality of reference images to be displayed on the electronic paper display device, the reference images comprising a predefined image which is used to assist the user in drawing a related image over the reference image without having to first draw the reference image” as recited in independent claims 1 and 10. The ‘927 patent merely discloses displaying screens from a typical application being run on a personal computer. For example, as noted in the Office Action, the ‘927 patent does disclose displaying images from various computer programs, such as Microsoft® Excel, Visio®, and CAD. However, this is no different than conventional electronic whiteboard sessions, in

which the display device is connected to a personal computer running these types of applications.

In contrast, Applicants claimed reference image comprises a predefined image which is used to assist the user in drawing a related image over the reference image without having to first draw the reference image. In other words, the reference image has a specific purpose for the user other than just to annotate over the replication of the computer screen. Rather, the claimed reference image functions as a template for assisting the user in drawing a related image. For example, the reference image may comprise a Cartesian plane to assist the user in drawing various types of graphs. In another example, the reference image may comprise a template of a flow chart which a user may then fill in. More generally, the reference images may correspond to a set of common predefined images that are used by a typical user of the device. In this manner, various common reference images may be displayed on the electronic paper display device and, thereby, minimize the amount of user time required. Furthermore, Applicants submit that the feature/limitation/element cited above from independent claims 1 and 10 includes “enabling the user to select one of a plurality of reference images.” The ‘072 patent and the ‘927 patent do not disclose, teach, or suggest this claimed feature/limitation/element.

For at least these reasons, Applicants respectfully submit that independent claims 1 and 10 are patentable over the cited art of record. Dependent claims 2 – 5 and 9 (which depend from independent claim 1) and dependent claims 13 – 18 (which depend from independent claim 10) are also patentable over the cited art for at least the reason that they include all of the features/limitations/elements of the base claims. Accordingly, Applicants respectfully request that the rejection of claims 1 – 5, 9, 10 and 13 – 18 be withdrawn and the claims be allowed.

**CONCLUSION**

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been rendered moot, and that pending claims 1 – 5, 9 – 10 and 13 – 18 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,



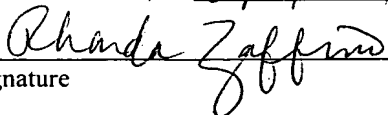
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Adam E. Crall, Reg. No. 46,646

**THOMAS, KAYDEN,  
HORSTEMEYER & RISLEY, L.L.P.**  
100 Galleria Parkway N.W., Suite 1750  
Atlanta, Georgia 30339  
(770) 933-9500

**CERTIFICATE OF MAILING**

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